

Obtained from the SBC BOCs a list of all FCC formal complaints, as defined in 47 CFR 1.720; FCC informal complaints, as defined in 47 CFR 1.716; and any written complaints made to a state regulatory commission from competitors filed during the first nine months of the Engagement Period involving alleged noncompliance with the Section 272 Requirements, including complaints submitted by competitors related to the provision or procurement of goods, services, facilities, and information, or in connection with the establishment of standards.

- Allegations of discriminatory provision or procurement of goods, services, facilities, or customer network services information (excludes CPNI) or the establishment of standards (*no complaints received*)
2. Obtained the SBC BOCs' written procurement procedures, practices, and policies for services and goods provided by each Section 272 affiliate. Noted upon inspection of the documentation obtained that no stated purchasing preferences were contained in the SBC BOCs' procedures. Noted per the documentation obtained that, in order to purchase goods or services from an affiliate, there are procedures the SBC BOCs must follow to comply with the Section 272 Requirements.

Noted that OP 6 – SBC Supplier Contracting is the SBC BOCs' primary guidance for procurement practices. The procurement process, including the bidding and vendor qualification/selection process, is performed by SBC Services, Inc. (an administrative affiliate) on behalf of all affiliated SBC entities, including the SBC BOCs. Section 4 of OP 6 details the supplier/contractor selection process. This section documents the dissemination process for requests for proposal ("RFPs") and the absence of purchasing preferences favoring the Section 272 affiliates.

Documented that the SBC BOCs' bidding process, the selection process, and how the SBC BOCs disseminate RFPs to affiliates and third parties are part of a six-step contracting process as follows:

- Step 1: Needs Assessment – initial identification of the needs, project scope, and the start of the documentation.
- Step 2: Supplier Search – identification of potential suppliers to meet client and company requirements.
- Step 3: Competitive Analysis – determination of quote methodology; competitive quote process or direct awards; and development of decision matrix to be used to evaluate responses.
- Step 4: Supplier Selection and Contract Negotiation – evaluation of supplier responses to RFPs, quotation and information, and negotiation of contracts.

Step 5: Contract Approval and Documentation – documentation of all required contract documents and procedures required for contract approval including financial analysis summary, project scope documents, financial risk/dependency letter, legal approvals, and executed documents.

Step 6: Contract Implementation and Administration – implementation and administration of the agreement upon execution by both parties.

Also noted that Section 10.502 of OP 6 includes a description of the requirements and restrictions applicable to transactions with the Section 272 affiliates as specified in Section 272 of the Act. As any procurement activity by an SBC BOC from a Section 272 affiliate would result in an affiliate transaction, OP 6 refers to OP 125 – “*Nontariffed Activities and affiliate Transactions*,” for complete instructions on affiliate transactions. SBC has established written controls to require any SBC BOC purchase from a Section 272 affiliate comply with Section 272, including the SBC BOCs’ nondiscriminatory procurement obligations. The internal control in place is that any nontariffed affiliate transaction must be approved by the Affiliate Oversight Group prior to the purchase; additionally, the approval process includes a review of the SBC BOCs’ nondiscrimination obligations.

3. SBC has represented that there were no SBC BOC procurement awards to Section 272 affiliates during the Engagement Period. In addition, inquired and SBC represented that there were no bids submitted by the Section 272 affiliates to the SBC BOCs during the Engagement Period.
4. Obtained a list of all goods, services, facilities, and customer network services information, excluding CPNI as defined in Section 222(f)(1) of the Act and exchange access services and facilities inspected in Objective IX, made available to each Section 272 affiliate by the SBC BOCs. SBC has represented that the only media used to inform unaffiliated entities of these services is the SBC Internet site, which contains a listing of services provided under tariff and affiliate agreements. Compared all services from the listings above to the SBC Internet site as of July 27, 2001. Based upon the comparison, noted that all services on the listings were located on the SBC Internet site at <http://www.sbc.com/PublicAffairs/PublicPolicy/Regulatory>.
5. Obtained the following listing of services provided by the SBC BOCs to the Section 272 affiliates and to unaffiliated carriers. As directed by the Joint Oversight Team, this listing does not include services provided under affiliate agreements, exchange access services, and interLATA network services that are the subject of other procedures in this report.

Table 7

Service	Purchased by SBCS from SBC BOCs	Purchased by ACI from SBC BOCs
Local Exchange Services	Yes	Yes
Billing & Collection Services ("B&C")	Yes	Yes
Enhanced Care Services	Yes	No
Account Maintenance Services	Yes	Yes
Equal Access Consulting Services	Yes	No

Obtained a listing of all unaffiliated carriers that purchased the same services from the SBC BOCs and the total amount of each service purchased by each unaffiliated carrier for the nine months ended March 31, 2001. For account maintenance services, carrier codes were provided in lieu of carrier names. Noted during the performance of other procedures that SBCS purchased local exchange services from SWBT totaling ****proprietary**** for the first nine months of the Engagement Period that were not included on the listing obtained above and, therefore, were not tested in this procedure.

The Joint Oversight Team selected B&C services and local exchange services for March 2001 for testing. Noted that SBCS purchased B&C services from SWBT and ACI purchased B&C services from Indiana Bell, Illinois Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell. For 38 unaffiliated carriers purchasing B&C services from SWBT and 34 unaffiliated carriers purchasing B&C services from Indiana Bell, Illinois Bell, Michigan Bell, Ohio Bell, or Wisconsin Bell, compared the rates, terms, and conditions on their March 2001 billing to the rates, terms, and conditions on the Section 272 affiliates' March 2001 billing from the comparable SBC BOC. The results of this comparison are shown on Attachment A-5a for SBCS and Attachment A-5b for ACI. SBC represented that the differences noted may result from differences in the customer's choices among the following contractual options: invoice billing; message billing; volume discount pricing; standard pricing; per page billing; and/or rate element billing.

SBC also disclosed that certain billings to ACI from the SBC BOCs for B&C services were inaccurately billed to ACI from July 2000 through November 2000. SBC represented that these billing inaccuracies were corrected in December 2000.

Noted that SBCS purchased local exchange services from Pacific Bell and ACI purchased local exchange services from Indiana Bell, Illinois Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell. As approved by the Joint Oversight Team, requested March 2001 invoices for 18 unaffiliated carriers purchasing local exchange services from Pacific Bell and 10 unaffiliated carriers purchasing local exchange services from Indiana Bell, Illinois Bell, Michigan Bell, Ohio Bell, or Wisconsin Bell.

Pacific Bell provided copies of Customer Service Records ("CSRs") for seven billing account numbers ("BANs") billed to SBCS as of March 2001 and 18 BANs billed to nine unaffiliated carriers. Compared the rates, by Universal Service Order Code ("USOC"), charged to SBCS to those charged to the unaffiliated carriers. For all the USOCs billed to SBCS, noted 16 USOCs that were also billed to the unaffiliated carriers. Noted that of these 16 comparable USOCs, 13 of the rates agreed without exception and three contained differences which are included in Attachment A-5c. SBC represented that the terms and conditions associated with these billings were the same for SBCS and the unaffiliated carriers. Obtained documentation verifying SBCS's payment to Pacific Bell and Pacific Bell's receipt of payment for the seven SBCS BANs provided above.

For the local exchange services provided by Indiana Bell, Illinois Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell, SBC provided a file containing USOCs, billed units, and billed amounts for the month of March 2001 for ACI facilities in Rosemont, Illinois; Muncie, Indiana; and Brookfield, Wisconsin, and ten unaffiliated retail customers (SBC was unable to identify and provide unaffiliated carrier information). SBC represented that this file was extracted from the Ameritech Customer Information System ("ACIS"). SBC represented that ACIS does not designate customers as "retail carriers" or "retail non-carriers." Sorted the information provided by USOC and class of service and compared the rates per USOC charged to ACI and the unaffiliated customers. Noted no comparable USOCs between the ACI location in Rosemont, Illinois, and the unaffiliated retail customers. Noted 30 comparable USOCs and classes of service between the ACI locations in Muncie and Brookfield and the unaffiliated retail customers. Noted that of these 30 comparable USOCs and classes of service, 24 compared to the rates charged to unaffiliated customers without exception and differences were noted in six USOC/class of service comparisons. Attachment A-5c lists the differences noted. SBC represented that tariff rates may vary depending on the term length selected by the customer. Obtained documentation verifying ACI's payment to Illinois Bell, Indiana Bell, and Wisconsin Bell for the ACI BANs listed on the file above.

6. Documented that the SBC BOCs' process for disseminating information pursuant to CC Docket No. 96-149, *First Report and Order*, Para. 16, about network changes, the establishment or adoption of new network standards, and the availability of new network services to each Section 272 affiliate and to unaffiliated entities is centralized with the SBC Network Services organization. The Network Services organization is made up of employees from SBC Management Services, Inc. Network Services maintains an internal Intranet page that documents the business requirements, criteria, and process flows for disseminating network standards. SBC uses Internet postings and Accessible Letters to notify unaffiliated entities, including the Section 272 affiliates. SBC's procedures address dissemination of information to both the Section 272 affiliates and unaffiliated entities. The documentation supporting the SBC BOCs' process for notification of network changes contains no distinction between notification processes for Section 272 affiliates and unaffiliated entities.

Once a project plan is reviewed, a determination is made by Legal and Regulatory as to whether notice is required. If notice is required, the project is control numbered, then determined as either short-term or long-term. Then the notification document is prepared and the project is forwarded on to the Facility Equipment Engineer for preparation of the project package and to the Engineering Single Point of Contact ("SPOC"). The Engineering SPOC reviews the notification document for compliance and then forwards the notification document to the regulatory department. The regulatory department then files the notification document for all long-term projects with the FCC. The regulatory department informs all telephone exchange providers of short-term projects by mail, then files the notification document for short-term projects with the FCC after five days. These notices are posted on the SBC Internet site at <http://www.sbc.com/PublicAffairs>. This section is organized by SBC network disclosures, then by each SBC BOC.

7. Obtained and inspected scripts that SBC BOCs' customer service representatives recite to new customers calling to establish new local telephone service from the three randomly selected call centers in Objective VII, Procedure 8. The call centers selected were located in Lubbock, Texas; Houston, Texas; and Des Peres, Missouri. Per review of these scripts, noted that the scripts contained the following:

- language that attempts to sell interLATA services;
- language that informs the consumers that there are other providers of interLATA services; and
- language offering to identify the other providers to the consumer if they are interested.

Noted per observation at the call centers that if a customer is interested in hearing the list of other providers, the call center representative clicks a button on the computer screen and a list of all the interLATA service providers is randomly generated and appears on the computer screen. SBC represented that the call center representatives are instructed to read the list of providers until the customer stops them. Further noted that because the list is randomly generated every time the customer requests this information, the providers are listed in different order so that all providers have the same chance of being read to customers first. Obtained this randomly generated listing from a call center representative and retained it in the workpapers.

Visited the Internet sites of the SBC BOCs, www.swbell.com, www.ameritech.com, www.pacbell.com, www.nevadabell.com, and www.snet.com, noting that the consumers are not informed on the Internet that there are other providers of interLATA services and, therefore, the other providers are not identified to the consumers. Further noted that only existing SBC BOC customers are able to order long-distance service over the Internet. Any new customers requesting service are instructed to call an SBC BOC representative for service. SBC represented that the equal access disclosure is then made over the telephone to the new customers. Obtained SBC representation stating, "the equal access obligation would not be required because such inbound ordering on the SBC Internet site

of SBC long distance service is limited to existing customers.” Verified this information per review of the Section 272 Requirements.

8. Observed five SBC BOC service representatives for one-half hour each, at each of the three call centers listed in Procedure 7 above. Noted the service representatives responding to inbound callers requesting to establish new local telephone service to whom the sales representatives attempted to market the Section 272 affiliates’ interLATA service.

Of the calls monitored, noted 20 calls which related to establishing new local telephone service and in which the sales representative informed the customer of other providers of intraLATA and/or interLATA services and informed the customer of their right to make the selection. Of the 20 calls, noted two calls in which the sales representative attempted to market the Section 272 affiliates’ interLATA service. In both calls, the marketing attempt was made after informing the customer of their options and rights.

In addition, listened in on phone calls that were not related to the establishment of new telephone service. The primary topics of these calls were technical problems with phone service, requests for additional services (caller ID, voicemail, call forwarding, etc.), and requests for status of in-process orders or disconnects.

9. SBC has represented that the Section 272 affiliates do not have a separate sales force and do not market exchange services on behalf of the SBC BOCs or as a reseller.

OBJECTIVE VIII. Determine whether or not the BOCs and an affiliate subject to Section 251(c) of the Act have fulfilled requests from unaffiliated entities for telephone exchange service and exchange access within a period no longer than the period in which they provide such telephone exchange service and exchange access to themselves or their affiliates.

1. The procedures used by the SBC BOCs to identify, track, respond to, and take corrective action to competitors’ complaints are documented in Objectives V and VI, Procedure 1.

Obtained from the SBC BOCs a list of all FCC formal complaints, as defined in 47 CFR 1.720; FCC informal complaints, as defined in 47 CFR 1.716; and any written complaints made to a state regulatory commission from competitors filed during the first nine months of the Engagement Period involving alleged noncompliance with the Section 272 Requirements, including complaints submitted by competitors related to the provision or procurement of goods, services, facilities, and information, or in connection with the establishment of standards.

- Allegations of discriminatory processing of orders for, and provisioning of, exchange access and exchange services and unbundled network elements, and discriminatory resolution of network problems (*no complaints received*)
2. Obtained the written information disclosure process that the SBC BOCs follow to collect performance data for the documentation of time intervals for processing of orders, provisioning of service, and performance of repair and maintenance services for themselves or their affiliates and for unaffiliated entities for exchange access services and presubscribed interexchange carrier ("PIC") change orders. Attachment A-6 lists the business rules for the Section 272 (e)(1) performance measurements, as obtained from SBC. SBC represented that the Section 272 affiliates do not resell local or intraLATA toll service and do not lease any unbundled network elements ("UNEs") from the SBC BOCs.

Noted that the written information disclosure process indicates that the 272 (e)(1) Information Disclosure Report will be produced quarterly, not later than 60 days after the close of the calendar quarter, and reports are available to interested parties upon request.

3. Obtained data tracked and maintained by the SBC BOCs during the first nine months of the Engagement Period, by month and quarter, indicating time intervals for processing of orders (for initial installation requests, subsequent requests for improvement, upgrades, or modifications of service, or repair and maintenance), provisioning of service, and performance of repair and maintenance services for themselves and their affiliates and for unaffiliated entities, as customers, for exchange access services and PIC change orders, as noted in Attachment A-7. SBC represented that the Section 272 affiliates do not resell local or intraLATA toll service and do not lease any UNEs from the SBC BOCs. In addition, noted the differences in time in fulfilling each type of request for the same services from the SBC BOCs or their affiliates and from unaffiliated entities.
4. Obtained the data tracked and maintained by SWBT during the Engagement Period in Procedure 3. Provided the results to the Joint Oversight Team. The Joint Oversight Team selected for testing: Performance Measure ("PM") #1 (Successful Completion According to Customer Desired Due Date) for March 2001 for Oklahoma, PM #5 (Mean Time to Restore) for March 2001 for Kansas, and PM #6 (Time to Restore PIC After Trouble Report) for February 2001 and PM #7 (Mean Time to Clear Network Trouble) for November 2000 for Texas.

Obtained the raw data from SWBT for each PM selected and, using a data analysis program, recalculated selected PMs 1 and 5 without exception. PM 6 was not able to be recalculated as the supporting documentation for the selected month was no longer available. SBC represented that the supporting data used to calculate PM 6 was not retained during the period October 2000 through March 2001 as the system used to calculate PM 6 replaced the prior month data with current month data upon calculation. SBC also represented that in April 2001 SBC began using a different system to calculate

PM 6 results and the underlying data is now retained. The Joint Oversight Team selected PM 7 as an alternative. Recalculated PM 7 (Mean Time to Clear Network Trouble) for Texas for the month of November 2000 and noted that measure 7 agreed without exception.

5. SBC represented that the SBC BOCs track and maintain the data as described in Procedure 2 above. Therefore, this step was not applicable.
6. Inquired and documented how the SBC BOCs make available to unaffiliated entities information regarding service intervals in providing any service to themselves or their affiliates and to unaffiliated entities. The service intervals are calculated and validated by the SBC BOCs for SBC and its affiliates and unaffiliated entities. Unaffiliated entities, Section 272 affiliates, and the FCC must contact the SBC BOCs to request service interval results for SBC and its affiliates. The results for SBC and its affiliates are provided to unaffiliated entities upon request. Unaffiliated entities may request the results from their account team contacts within the SBC BOC.

OBJECTIVE IX. Determine whether or not the BOCs and an affiliate subject to Section 251(c) of the Act have made available facilities, services, or information concerning its provision of exchange access to other providers of interLATA services on the same terms and conditions as they have to their affiliate required under Section 272 that operates in the same market.

1. The procedures used by the SBC BOCs to identify, track, respond to, and take corrective action to competitors' complaints are documented in Objectives V and VI, Procedure 1.

Obtained from the SBC BOCs a list of all FCC formal complaints, as defined in 47 CFR 1.720; FCC informal complaints, as defined in 47 CFR 1.716; and any written complaints made to a state regulatory commission from competitors filed during the first nine months of the Engagement Period involving alleged noncompliance with the Section 272 Requirements, including complaints submitted by competitors related to the provision or procurement of goods, services, facilities, and information, or in connection with the establishment of standards.

- Allegations of discriminatory availability of exchange access facilities (*no complaints received*)

2. Obtained a list of exchange access services and facilities with their related rates offered to each Section 272 affiliate and noted that these services and facilities were made available at the same rates and on the same terms and conditions to all carriers through the use of generally available tariffs. Obtained summaries of all exchange access services and facilities from the relevant SBC Internet site, <https://www2.sbcprimeaccess.com>. SBC notifies carriers through the use of accessible letters that are mailed or electronically sent

and posted on the Internet at <https://www2.sbcprimeaccess.com>. Obtained the index to the Internet site that listed all accessible letters related to exchange access services and facilities. SBC represented that other media are used such as trade shows, customer meetings, published product guides, etc.; however, these media are only available at different times, such as when a trade show takes place. SBC did not provide examples of these forms of media as none were currently being utilized.

3. Obtained a listing of all invoices for exchange access services and facilities, by BAN, issued to the Section 272 affiliates by the SBC BOCs for the month of January 2001. From the listings obtained, randomly selected 50 BANs and obtained copies of these invoices. The listing of the total billed amounts for January 2001 and sample selection is summarized below.

Table 8

From SBC BOC	Number of BANs Listed	Total Invoiced Amounts for January 2001	Number of BANs Sampled	Total Sampled Invoices
SWBT	**proprietary**	**proprietary**	**proprietary**	**proprietary**
Ameritech	**proprietary**	**proprietary**	**proprietary**	**proprietary**
Pacific Bell	**proprietary**	**proprietary**	**proprietary**	**proprietary**
SNET	**proprietary**	**proprietary**	**proprietary**	**proprietary**
Total	**proprietary**	**proprietary**	**proprietary**	**proprietary**

From the 50 invoices obtained above, extracted 100 different USOCs charged to the Section 272 affiliates. The USOCs selected are documented at Attachment A-8a. SBC produced a query of these USOCs with associated rates charged to the Section 272 affiliates and 10 unaffiliated carriers from the SBC BOCs' Carrier Access Billing System ("CABS") for the month of January 2001. Using the resulting data from this query, compared the rates, by USOC, state, and class of service, charged to the 10 unaffiliated carriers and the Section 272 affiliates. Differences are listed on Attachment A-8b. For the USOCs queried, 29 had comparable USOC/class of service combinations between the Section 272 affiliates and 10 unaffiliated carriers. Seven of the comparable USOC/class of service combinations billed to other carriers were billed at rates different from the rates billed to the Section 272 affiliates. SBC represented that the rate differences were due to the following reasons:

- For USOCs 1J5HS and 1L5XX, variances are due to zone and term differences.
- For USOCs 10XHX, TUZPX, and 1L5XX, variances are due to volume differences.
- For USOC TMECS, variances are due to zone and term differences.

To test the comparability of terms and conditions offered to the Section 272 affiliates and unaffiliated carriers, the Joint Oversight Team approved a judgmental selection of invoices from 13 unaffiliated carriers to compare to the terms and conditions offered to the Section 272 affiliates and affiliated carriers. For the judgmental sample of one invoice from a different unaffiliated carrier from each of the 13 states served by SBC, compared the terms and conditions and noted no differences.

4. For the 50 invoices obtained in Procedure 3 above, attempted to trace the amount invoiced for exchange access services to each Section 272 affiliate and determine whether the amount invoiced was recorded by the SBC BOC and paid by the Section 272 affiliate. For 25 of the 50 invoices determined that the SBC BOCs recorded the amounts invoiced and that SBCS paid the amounts invoiced, with the exception of one invoice in which there was a difference of ****proprietary**** between the amount charged by the SBC BOC and the amount paid by SBCS. SBCS did not provide documentation of payment for six of the 50 invoices from Procedure 3 above, totaling ****proprietary****. SBCS represented that these invoices did not relate to the Section 272 affiliate and were improperly included in the listing of invoices obtained in Procedure 3 above.

Nineteen of the 50 invoices obtained in Procedure 3 above related to ACI. SBC provided no payment or receipt documentation, from either ACI or the SBC BOCs, relating to these BANs. SBC represented that these BANs were assigned to Williams Communications as of September 30, 2000 and after this date ACI was no longer responsible for payment of these accounts. These accounts were improperly included in the listing of invoices obtained in Procedure 3 above.

OBJECTIVE X. Determine whether or not the BOCs and an affiliate subject to Section 251(c) of the Act have charged their separate affiliate under Section 272, or imputed to themselves (if using the access for their provision of their own services), an amount for access to their telephone exchange service and exchange access that is no less than the amount charged to any unaffiliated interexchange carriers for such service.

1. SBC has represented that there are no written agreements, other than tariffs, that Section 272 affiliates and other interexchange carriers ("IXCs") have with the SBC BOCs for exchange access services. Exchange access services are offered via tariff.
2. Inquired of SBC and documented at Attachment A-9 those LATAs of the SBC BOCs that have price flexibility for interLATA interstate and interLATA intrastate access services.
3. As noted in Procedure 1 above, SBC has represented that the Section 272 affiliates and other interexchange carriers do not have written agreements other than tariffs with the SBC BOCs for exchange access services. Therefore, no testing was performed.

4. Obtained a list of five interLATA services offered by the SBC BOCs and discussed the list with the appropriate SBC representative, who indicated that the list was comprehensive. Compared the services appearing on the list with the incidental interLATA services disclosed in the SBC BOCs' CAM and noted no differences. Compared the nonregulated incidental interLATA services listed in the SBC BOCs' CAM with those defined as incidental in Section 271(g) of the Act and those interLATA services allowed under FCC order and noted no differences.
5. Obtained a statement of revenue, by month, of incidental interLATA services provided by the SBC BOCs for the first nine months of the Engagement Period, and performed a trend analysis. For increases of more than 10% from month to month, inquired of SBC and obtained explanations for the differences as noted below:

Table 9

SWBT
Service: E911
Trend: Revenues decreased from \$712,863 in August 2000 to a deficit of **proprietary** in September 2000. Revenues then in turn increased to **proprietary** in October 2000.
SBC Explanation: The fluctuations are a result of a customer credit in September 2000 and the subsequent correction in October 2000. Customer credits in September 2000 reflect the loss of a Texas customer to another provider. The credits should have been split between regulated and nonregulated revenues but were all booked to the non-regulated revenues account. The October increase reflects the adjustment to reclassify the appropriate credit amount to the nonregulated account.
Illinois Bell, Indiana Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell
Service: E911
Trend: Revenues increased from **proprietary** in July 2000 to **proprietary** in August 2000.
SBC Explanation: The fluctuation is a result of credits for previous over-billings in Indiana and an erroneous journal entry crediting a one-time SONET charge to the 911 product account.
Trend: Revenues increased from **proprietary** in September 2000 to **proprietary** in October 2000. Revenues increased from **proprietary** in November 2000 to **proprietary** in December 2000.
SBC Explanation: The fluctuations are a result of year to date corrections in Indiana during October 2000 for 911 revenues erroneously booked to Centrex and SONET revenues erroneously booked to 911 and subsequently reversed in November 2000.

SWBT
Service: National Directory Assistance
Trend: Revenues increased from **proprietary** in July 2000 to **proprietary** in August 2000. Revenues increased from **proprietary** in September 2000 to **proprietary** in October 2000 and **proprietary** in November 2000. Revenues increased from **proprietary** in December 2000 to **proprietary** in January 2001.
SBC Explanation: The fluctuations are due to an ongoing reclassification of National Listing Service ("NLS") revenues from local to nonregulated revenues. A year to date reclassification occurred in August 2000 causing the significant upward fluctuation in revenues.

Illinois Bell, Indiana Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell
Service: National Directory Assistance
Trend: Revenues increased from **proprietary** in August 2000 to **proprietary** in September 2000. Revenues increased from **proprietary** in January 2001 to **proprietary** in February 2001.
SBC Explanation: The fluctuations are a result of manual journal entries associated with wholesale billing of services. These manual journal entries are received and booked every two to three months and are not recorded on a monthly basis. In addition, SBC has represented that for any usage-based charge, month-to-month swings are considered normal. However, in the case of the wholesale market, these swings are more pronounced.

Pacific Bell
Service: National Directory Assistance
Trend: Revenues increased from **proprietary** in July 2000 to **proprietary** in August 2000. Revenues increased from **proprietary** in December 2000 to **proprietary** in January 2001.
SBC Explanation: The fluctuations are a result of a mechanized accrual and reversal process, embedded in the billing system, for unbilled usage. This process is used to associate the billing with the same month as the usage (e.g., January usage billed in February is treated as revenues earned in January). In addition, a price increase took effect in January 2001.

SWBT
Service: SS7 Signaling (Line Information Data Bases ("LIDB"), Calling Name ("CNAM"), etc.)
Trend: Revenues increased from \$356,920 in September 2000 to **proprietary** in October 2000. Revenues increased from a deficit of **proprietary** in November 2000 to **proprietary** in December 2000 and to **proprietary** in January 2001. Revenues increased from **proprietary** in February 2001 to **proprietary** in March 2001.

SBC Explanation: The fluctuations are a result of SBC's migration of LIDB and CNAM billing from both the mechanized and manual Pacific Bell billing systems to the SWBT mechanized billing system. The fluctuations are a result of billing errors, and subsequent corrections, associated with this billing change. The SWBT billing system not only billed the Pacific Bell customers but also billed Pacific Bell for service. In addition, fine-tuning the transition from manual billing to mechanized billing caused considerable "out of period" billing.

Pacific Bell

Service: SS7 Signaling (LIDB, CNAM, etc.)

Trend: Revenues increased from ****proprietary**** in August 2000 to ****proprietary**** in September 2000. Revenues increased from ****proprietary**** in October 2000 to ****proprietary**** in November 2000.

SBC Explanation: The fluctuations are a result of SBC's migration of LIDB and CNAM billing from both the mechanized and manual Pacific Bell billing systems to the SWBT mechanized billing system. The fluctuations are a result of billing errors, and subsequent corrections, associated with this billing change. The SWBT billing system not only billed the Pacific Bell customers but also billed Pacific Bell for service. In addition, fine-tuning the transition from manual billing to mechanized billing caused considerable "out of period" billing.

6. From the list of services obtained in Procedure 4 above, selected one interLATA service offered by the BOCs and not through an affiliate. The service selected was National Directory Assistance. Obtained an analysis prepared by the BOCs used to calculate the amount the BOCs have imputed (charged) to themselves for access, switching, and transport. Obtained usage details, rates imputed and tariff rates for each item in the analysis. Compared the rates imputed to the tariff rates and noted no differences. Traced the amounts imputed by the BOCs to the general ledger and noted that the entry was a debit to nonregulated operating revenues (decrease) and a credit to regulated revenues (increase).
7. For exchange access services and local exchange services, documented, in the table below, the total amount that the Section 272 affiliates recorded on their books and compared it to the total amount that the Section 272 affiliates paid to the SBC BOCs for these services and to the amount of corresponding revenue reflected in the SBC BOCs' books during the nine months ended March 31, 2001. SBC represented that the Section 272 affiliates purchased no unbundled network elements from the SBC BOCs during the Engagement Period. Noted, through inquiry, that SBCS purchased local exchange service from Pacific Bell and SWBT and exchange access service from SWBT, Pacific Bell, Illinois Bell, Indiana Bell, and Michigan Bell. ACI purchased both exchange access and local exchange service from Illinois Bell, Indiana Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell and exchange access service from SWBT.

Table 10

For the Nine Months Ended March 31, 2001	SBCS Exchange Access Service	SBCS Local Exchange Service from Pacific Bell	SBCS Local Exchange Service from SWBT	ACI Exchange Access Service	ACI Local Exchange Service
Amount recorded on books of Section 272 affiliate	**proprietary**	**proprietary**	**proprietary**	**proprietary**	**proprietary**
Amount paid by Section 272 affiliate to SBC BOCs	**proprietary**	**proprietary**	**proprietary**	**proprietary**	**proprietary**
Amount of corresponding revenue recorded by SBC BOCs	**proprietary**	**proprietary**	**proprietary**	**proprietary**	**proprietary**

SBC represented that all of ACI's exchange access service and local exchange service were transferred to Williams Communications on October 1, 2000 and most of the ACI differences noted above are due to the SBC BOCs' continuing to record after October 1, 2000 as ACI revenue instead of revenue from Williams Communications.

SBC represented that differences between the Section 272 affiliates' recorded amounts and the SBC BOCs' recorded amounts are also due to the Section 272 affiliates' including tax amounts in their totals, while tax amounts are excluded from the SBC BOC amounts, and timing differences, such as when the SBC BOC records revenue in one month while the affiliate pays the bill and records the expense in a subsequent month. SBC also represented that amounts under dispute from SBCS for exchange access service from the SBC BOCs total ****proprietary****.

OBJECTIVE XI. Determine whether or not the BOCs and an affiliate subject to Section 251(c) of the Act have provided any interLATA facilities or services to their interLATA affiliate and made available such services or facilities to all carriers at the same rates and on the same terms and conditions, and allocated the associated costs appropriately.

1. The procedures used by the SBC BOCs to identify, track, respond to, and take corrective action to competitors' complaints are documented in Objectives V and VI, Procedure 1.

Obtained from the SBC BOCs a list of all FCC formal complaints, as defined in 47 CFR 1.720; FCC informal complaints, as defined in 47 CFR 1.716; and any written complaints

made to a state regulatory commission from competitors filed during the first nine months of the Engagement Period involving alleged noncompliance with the Section 272 Requirements, including complaints submitted by competitors related to the provision or procurement of goods, services, facilities, and information, or in connection with the establishment of standards. Noted three complaints filed during the Engagement Period. Of the three complaints filed during the first nine months of the Engagement Period, noted that two complaints were resolved while one remained open and under investigation.

- Allegations of discriminatory availability of interLATA facilities or services not at the same rates and not on the same terms and conditions as the interLATA affiliates (*three complaints received*)

1. On September 22, 2000, AT&T Communications of Texas, L.P. filed a complaint with the Public Utility Commission of Texas alleging that the long distance rates offered in Texas by SBCS did not cover its own operating expenses, and thus were being subsidized by SWBT. The Public Utility Commission of Texas has scheduled a hearing regarding this complaint on December 17, 2001.
 2. On April 27, 2001, AT&T Communications of the Southwest, Inc. filed testimony in SBCS's application with the Oklahoma Corporation Commission ("OCC") to determine if its interexchange services are subject to effective competition, alleging that SBCS had a competitive advantage over other IXCs since SWBT's access charges were not based on costs. On June 12, 2001, the OCC issued an order in SBCS's favor determining that SBCS was subject to effective competition.
 3. On March 6, 2001, AT&T Communications of the Southwest, Inc. filed an emergency motion in SBCS's tariff approval docket pending with the Kansas Corporation Commission, alleging that SBCS's rates were unlawful, unduly, preferential, and anti-competitive. On May 15, 2001, an agreement was reached between SWBT, AT&T, and others that reduced SWBT's intrastate access rates to parity with SWBT's interstate access rates, and AT&T agreed to withdraw its complaints in SBCS's tariff proceedings.
2. SBC represented that there is not a list of interLATA network services and facilities with their related rates offered by the SBC BOCs to the Section 272 affiliates. All rates charged to the Section 272 affiliates and unaffiliated carriers for interLATA network services and facilities are tariffed rates and are publicly available on the Internet. Obtained a list of tariffs showing rate information for the interLATA network services and facilities offered by the SBC BOCs to the Section 272 affiliates.

Obtained invoices for interLATA network services and facilities for one month rendered by the SBC BOCs to the Section 272 affiliates and other IXC's that received services from the SBC BOCs. The Joint Oversight Team, after discussions with SBC, selected November 5, 2000 billings to SBCS and ****proprietary**** for testing.

3. The November 5, 2000 billings to SBCS and ****proprietary**** included one invoice each. Inspected underlying details of the invoice to SBCS and the invoice to ****proprietary**** and compared rates charged and applied to SBCS and ****proprietary**** and noted that there was only one USOC that resulted in charged amounts. This USOC was detailed in four instances on each invoice. Compared each instance noting no variance among the invoices.

SBC represented that the USOC PT8JX is for a Dedicated End Office Trunk in SWBT FCC Tariff 73 Page 6-185. The rate listed in the tariff was \$18.00. Both SBCS and ****proprietary**** were charged the \$18.00 rate for this USOC on the November 2000 invoice. No rate difference was noted.

The remaining USOCs detailed on each invoice were the same, each with no charge denoted. Additionally, noted the basic monthly access charge for SBCS was ****proprietary****, ****proprietary**** units at \$18.00 each, with an additional tax of ****proprietary**** for federal taxes and local state tax (Kansas); this brings SBCS's monthly access charge to a total of approximately ****proprietary****. The basic monthly access charge for ****proprietary**** was ****proprietary****, ****proprietary**** units at \$18.00 each; noted a tax-exempt status per ****proprietary**** invoice detail. SBC represented that the variance in the total monthly access charge between SBCS and ****proprietary**** is due to ****proprietary**** ordering two more services and ****proprietary**** tax-exempt status.

Noted that the terms and conditions detailed on the bills to SBCS and ****proprietary**** were the same.

SBC represented that ACI did not receive interLATA services from the SBC BOCs during the Engagement Period.

4. Using the invoices obtained in Procedure 3 above, traced the amount invoiced to the Section 272 affiliate for interLATA facilities and services and determined the amount invoiced was the amount recorded by the SBC BOC and paid by the Section 272 affiliate. For this purpose, obtained screen prints from SBCS's accounting system that detailed customer account and payment history. Additionally, obtained screen prints from the SBC BOC that showed the amount booked as revenue. Additionally, agreed the dollar amount per the SBC BOC accounting system to the payment amount per SBCS's accounting system. Obtained the voucher payment support from SBCS for the payment made. Documentation obtained from SWBT indicated that SBCS paid the November 5, 2000

invoice on January 17, 2001. Obtained copies of SBCS's December 5, 2000 invoice from SWBT for this account and noted that late fees related to the unpaid balance from the November 5, 2000 invoice were charged to SBCS on the December 1 invoice from SWBT.

In addition to the procedures discussed above, SBC made the following representations regarding compliance with the Section 272 Requirements:

- In an Ex Parte letter to the FCC dated August 8, 2000, SBC disclosed the circumstances leading to a delay in compliance with the nondiscriminatory requirements under Section 272 (c)(1) related to Ameritech's offering of in-region nonlocal directory assistance.
- SBC represented that disclosure was made to the FCC on September 29, 2000 regarding Pacific Bell's provision of interLATA foreign exchange service to approximately 30 customers in California. SBC represented that this results from the customers claiming that Pacific Bell has a grandfathered obligation to provide service across the LATA boundary. This claim is currently under review by the California Public Utilities Commission.

Section 272 Affiliates
Employees and Departments by Location

Attachment A-1
Objective I, Procedure 3

ACI

Location			Department							
Street Address	City	State	Affiliate Services	Billing and Revenue Assurance	Customer Care	Finance	Network Operations	Network Planning and Engineering Data and Voice	Operator Services	Total
proprietary	**proprieta	**propri							**propriet	**propriet
	ry**	etary							ary**	ary**
		**								
proprietary	**proprieta	**propri							**propriet	**propriet
	ry**	etary							ary**	ary**
		**								
proprietary	**proprieta	**propri	**propriet				**proprieta	**proprietar		**propriet
	ry**	etary	ary**				ry**	y**		ary**
		**								
proprietary	**proprieta	**propri			**proprieta					**propriet
	ry**	etary			ry**					ary**
		**								
proprietary	**proprieta	**propri	**propriet	**proprietar	**proprieta	**propriet		**proprietar	**propriet	**propriet
	ry**	etary	ary**	y**	ry**	ary**		y**	ary**	ary**
		**								
Total			**propriet	**proprietar	**proprieta	**propriet	**proprieta	**proprietar	**propriet	**propriet
			ary**	y**	ry**	ary**	ry**	y**	ary**	ary**

SBCS

Department	Location: **proprietary**
Affiliate Services	**proprietary**
Billing and Revenue Assurance	**proprietary**
Business Operations	**proprietary**
Customer Care	**proprietary**
Employee Communications	**proprietary**
Finance	**proprietary**
Legal	**proprietary**
Marketing	**proprietary**
Network Operations	**proprietary**
Network Planning and Engineering	**proprietary**
President of SBCS and ACI	**proprietary**
Product Design and Architecture	**proprietary**
Product Design and Development Data	**proprietary**
Product Development	**proprietary**
Regulatory	**proprietary**
Total	**proprietary**

Vendor	Section 272 Affiliate	Section 272 Affiliate Location
Planning and Engineering		
proprietary	ACI	**proprietary**
proprietary	ACI	**proprietary**
proprietary	ACI	**proprietary**
proprietary	ACI	**proprietary**
proprietary	ACI	**proprietary**
proprietary	ACI	**proprietary**
proprietary	SBCS	**proprietary**
Network Operations		
proprietary	ACI	**proprietary**
proprietary	ACI	**proprietary**
proprietary	ACI	**proprietary**
proprietary	ACI	**proprietary**
proprietary	ACI	**proprietary**
proprietary	ACI	**proprietary**
proprietary	SBCS	**proprietary**
proprietary	SBCS	**proprietary**
proprietary	SBCS	**proprietary**

Note: SBC represented that the OI&M services listed above were received by the Section 272 affiliates throughout their systems; therefore an individual location of the service provided was not feasible. Therefore, the primary address of the Section 272 affiliate is listed as the receiving location.

Employee Reference	Company	Start Date	End Date
1	ACI	October 14, 1996	April 1, 1997
	Ameritech Services, Inc.	April 1, 1997	May 1, 1998
	Ameritech Center Phase I	May 1, 1998	-
2	Michigan Bell	December 9, 1992	November 1, 1995
	ACI	November 1, 1995	October 1, 2000
	Ameritech Services, Inc.	October 1, 2000	November 1, 2000
	ACI	November 1, 2000	December 31, 2000
3	ACI	January 13, 1997	April 1, 1997
	Ameritech Information Services	April 1, 1997	September 9, 1998
4	Ameritech Mobile Communications	March 10, 1997	May 30, 1999
	AMP	May 30, 1999	October 9, 1999
	ACI	August 14, 2000	September 16, 2000
5	Ameritech Services, Inc.	May 20, 1996	April 1, 2000
	ACI	April 1, 2000	April 1, 2000
	Ameritech Services, Inc.	April 1, 2000	-
6	ACI	October 30, 1996	November 1, 1997
	Illinois Bell	November 1, 1997	December 26, 1997
7	Ameritech Services, Inc.	January 15, 1996	January 1, 1997
	Ameritech Center Phase I	January 1, 1997	August 1, 1998
	ACI	August 1, 1998	October 16, 1999
8	Wisconsin Bell	October 6, 1997	November 3, 1997
	ACI	July 26, 1999	July 27, 1999
	ACI	August 24, 1999	September 9, 1999
9	ACI	June 1, 1996	April 1, 2000
	Ameritech Services, Inc.	April 1, 2000	-
10	ACI	June 19, 1995	August 1, 2000
	Ameritech Services, Inc.	August 1, 2000	-
11	ACI	March 16, 1998	April 1, 2000
	Ameritech Services, Inc.	April 1, 2000	-
12	Michigan Bell	December 9, 1992	January 1, 1994
	Ameritech Services, Inc.	January 1, 1994	June 1, 1995
	ACI	June 1, 1995	April 1, 1997
13	ACI	May 26, 1998	November 19, 2000
	Ameritech Services, Inc.	November 19, 2000	-
14	ACI	June 23, 1997	April 1, 2000
	Ameritech Services, Inc.	April 1, 2000	-

Employee Reference	Company	Start Date	End Date
15	ACI	September 11, 1995	June 1, 1997
	INT	June 1, 1997	August 1, 1998
	Ameritech Center Phase I	August 1, 1998	March 17, 2000
16	Illinois Bell	December 1, 1992	July 1, 2000
	ACI	July 1, 2000	November 16, 2000
17	Wisconsin Bell	June 5, 1995	December 2, 1995
	ACI	November 9, 1998	December 3, 1998
18	ACI	March 2, 1998	March 13, 1998
	Ameritech Services, Inc.	May 15, 2000	-
19	ACI	December 30, 1996	June 1, 2000
	Ameritech Services, Inc.	June 1, 2000	-
20	Pacific Bell	February 17, 1978	March 15, 1997
	SBCS	January 1, 2001	February 28, 2001
21	Pacific Bell	May 7, 1980	March 15, 1998
	SBCS	February 15, 2001	February 28, 2001
22	Pacific Bell	March 2, 1981	December 31, 1996
	SBCS	June 16, 2000	February 28, 2001
23	Pacific Bell	April 2, 1997	February 28, 1998
	SBCS	April 1, 1999	-

Note: Employee names have been replaced with a reference number.

Internet Posting Exceptions

Attachment A-4
Objectives V, VI, Procedure 6

Agreement	Contract #	Affiliate Providing Service	Affiliate Receiving Service	Effective Date		On the Internet at March 29, 2001	Prices, Terms, & Conditions Same as Internet
Intellectual Property License Agreement	300-600-501	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property/Proprietary Information	300-600-501	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property/Proprietary Information Pricing Addendum 2000	300-600-501	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property License Agreement	300-600-502	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property/Proprietary Information	300-600-502	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property/Proprietary Information Pricing Addendum 2000	300-600-502	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property License Agreement	300-600-503	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property/Proprietary Information	300-600-503	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property/Proprietary Information Pricing Addendum 2000	300-600-503	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property License Agreement	300-600-504	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property/Proprietary Information	300-600-504	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property/Proprietary Information Pricing Addendum 2000	300-600-504	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property License Agreement	300-600-505	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property/Proprietary Information	300-600-505	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Intellectual Property/Proprietary Information Pricing Addendum 2000	300-600-505	Illinois Bell	SBCS	November 13, 2000	No	Yes	Yes
Sublease Agreement, 9022 Bowling Green, Greenville, MI		Michigan Bell	ACI	March 1, 1997	No	Yes	Yes
Employee Concession: Schedule 899	Schedule 899	Nevada Bell	SBCS	January 1, 2001 to December 31, 2001	Yes	No	Yes ¹
Intellectual Property/Proprietary Information	820-600-501	Nevada Bell	SBCS	November 13, 2000	Yes	Yes	Could not download

Internet Posting Exceptions

Attachment A-4
Objectives V, VI, Procedure 6

Agreement	Contract #	Affiliate Providing Service	Affiliate Receiving Service	Effective Date		On the Internet at March 29, 2001	Prices, Terms, & Conditions Same as Internet
Intellectual Property Pricing Addendum	820-600-501	Nevada Bell	SBCS	November 13, 2000	Yes	Yes	Could not download
Joint Marketing and Sales Support: November 15, 2000	810	Nevada Bell	SBCS	November 15, 2000 to December 31, 2001	Yes	No	N/A
Joint Marketing and Sales Support Pricing Addendum, November 15, 2000	810	Nevada Bell	SBCS	November 15, 2000	Yes	No	N/A
Intellectual Property Pricing Addendum	600-100	Pacific Bell	SBCS	January 1, 2000	No	No	N/A
Employee Concession Schedule 699	Schedule 699	Pacific Bell	SBCS	January 1, 2001 to December 31, 2001	Yes	No	Yes ¹
Billing Services Pricing Addendum 10/1/99	511	Pacific Bell	SBCS	October 1, 1999	Yes	No	No
Business Communication Services Pricing Addendum, February 11, 2000	510	Pacific Bell	SBCS	February 11, 2000	Yes	No	No
Consumer Markets Group Pricing Addendum, November 11, 2000	513	Pacific Bell	SBCS	November 2, 2000	Yes	No	Yes ¹
Consumer Markets Group Pricing Addendum, March 19, 2001	513	Pacific Bell	SBCS	March 19, 2001	Yes	No	Yes ¹
Consumer Markets Group Pricing Addendum, August 8, 2000	513	Pacific Bell	SBCS	August 10, 2000	Yes	No	Yes ¹
Network Operations Services	622	Pacific Bell	SBCS	January 1, 2000 to December 31, 2000	Yes	No	No
Network Operations Services Pricing Addendum, October 1, 1999	622	Pacific Bell	SBCS	October 1, 1999	Yes	No	No
Network Operations Services Pricing Addendum, February 4, 2000	622	Pacific Bell	SBCS	February 4, 2000	Yes	No	No
Temporary Projects	526	Pacific Bell	SBCS	January 1, 1999	Yes	Yes	No; Term on Internet agreement starts from 1/1/98
Global Sales Support Pricing Addendum, October 31, 2000	999	SNET	ACI	October 31, 2000	Yes	No	No
Premise Sales Support	977	SWBT	SBCS	January 1, 2000 to December 31, 2000	Yes	No	No
Premise Sales Support Pricing Addendum, February 8, 2000	977	SWBT	SBCS	February 8, 2000	Yes	No	No
Premise Sales Support Pricing Addendum, July 10, 2000	977	SWBT	SBCS	July 10, 2000	Yes	No	No
Premise Sales Support Pricing Addendum, January 18, 2000	977	SWBT	ACI	January 18, 2000	Yes	No	No
Temporary Projects Pricing Addendum	26	SWBT	SBCS	May 17, 2000	Yes	No	No
Temporary Projects Pricing Addendum	26	SWBT	SBCS	March 27, 2000	Yes	No	No
Temporary Projects Pricing Addendum	26	SWBT	SBCS	March 16, 2000	Yes	No	No
Temporary Projects Pricing Addendum	26	SWBT	SBCS	January 14, 2000	Yes	No	No

Internet Posting Exceptions

Attachment A-4 Objectives V, VI, Procedure 6

Agreement	Contract #	Affiliate Providing Service	Affiliate Receiving Service	Effective Date		On the Internet at March 29, 2001	Prices, Terms, & Conditions Same as Internet
Operator Services Support Pricing Addendum, January 10, 2000	995	SWBT	SBCS	January 10, 2000	Yes	No	No
Operator Services Support Pricing Addendum, May 20, 2000	995	SWBT	SBCS	May 20, 2000	Yes	No	No
SBCSI/Operator Services Recording Agreement Addendum	995	SWBT	SBCS	June 26, 2000	Yes	No	No

¹ Prices, terms, and conditions for all agreements compared to the agreements on the Internet as of March 29, 2001. For these noted agreements, the prices, terms, and conditions were compared to the agreements posted to the Internet after the March 29, 2001 test date.

Comparison of Billing & Collection Rates
SBCS and Unaffiliated Carriers

Attachment A-5a
Objective VII, Procedure 5

Invoice Item	# of Carriers Billed at a Different Rate	Bill Rates		
		SBCS	Other Carrier	Difference
proprietary	31	*proprietary*	\$ 0.0010	*proprietary*
proprietary	24	*proprietary*	0.0010	*proprietary*
proprietary	9	*proprietary*	0.1000	*proprietary*
proprietary	9	*proprietary*	0.1000	*proprietary*
proprietary	1	*proprietary*	0.1000	*proprietary*
	13	*proprietary*	0.0300	*proprietary*
proprietary	17	*proprietary*	0.1000	*proprietary*
proprietary	9	*proprietary*	0.0500	*proprietary*
proprietary	9	*proprietary*	0.0500	*proprietary*
proprietary	1	*proprietary*	0.0500	*proprietary*
	13	*proprietary*	0.0300	*proprietary*
proprietary	1	*proprietary*	0.1000	*proprietary*
	16	*proprietary*	0.0500	*proprietary*
proprietary	9	*proprietary*	0.0500	*proprietary*
proprietary	9	*proprietary*	0.0500	*proprietary*
proprietary	1	*proprietary*	0.0500	*proprietary*
	13	*proprietary*	0.0100	*proprietary*
proprietary	17	*proprietary*	0.0500	*proprietary*
proprietary	3	*proprietary*	0.4000	*proprietary*
	1	*proprietary*	0.5333	*proprietary*
	32	*proprietary*	0.4033	*proprietary*
proprietary	3	*proprietary*	0.4000	*proprietary*
	1	*proprietary*	0.5300	*proprietary*
	27	*proprietary*	0.4033	*proprietary*
proprietary	16	*proprietary*	0.5550	*proprietary*
	1	*proprietary*	0.5300	*proprietary*
	14	*proprietary*	0.4033	*proprietary*
proprietary	14	*proprietary*	0.4000	*proprietary*
	16	*proprietary*	0.4033	*proprietary*
	1	*proprietary*	0.5300	*proprietary*
proprietary	4	*proprietary*	0.0300	*proprietary*
proprietary	3	*proprietary*	0.0300	*proprietary*
	1	*proprietary*	0.0250	*proprietary*
proprietary	1	*proprietary*	0.0250	*proprietary*
	2	*proprietary*	0.0233	*proprietary*
proprietary	14	*proprietary*	0.9000	*proprietary*
proprietary	2	*proprietary*	0.0045	*proprietary*
proprietary	1	*proprietary*	0.0045	*proprietary*
proprietary	2	*proprietary*	0.0500	*proprietary*
proprietary	2	*proprietary*	0.0500	*proprietary*
proprietary	2	*proprietary*	0.0200	*proprietary*
proprietary	2	*proprietary*	0.0233	*proprietary*
proprietary	24	*proprietary*	0.0010	*proprietary*
proprietary	1	*proprietary*	0.0010	*proprietary*
proprietary	10	*proprietary*	0.0001	*proprietary*
proprietary	11	*proprietary*	0.0010	*proprietary*

Comparison of Billing & Collection Rates
ACI and Unaffiliated Carriers

Attachment A-5b
Objective VII, Procedure 5

Invoice Item	# of Carriers Billed at a Different Rate	Bill Rates		
		ACI	Other Carrier	Difference
proprietary	1	**proprietary**	\$ 0.0300	**proprietary**
proprietary	1	**proprietary**	\$ 0.0300	**proprietary**
proprietary	2	**proprietary**	\$ 0.0700	**proprietary**
	1	**proprietary**	\$ 0.0600	**proprietary**
	25	**proprietary**	\$ 0.0500	**proprietary**
proprietary	2	**proprietary**	\$ 0.0700	**proprietary**
	1	**proprietary**	\$ 0.0600	**proprietary**
	25	**proprietary**	\$ 0.0500	**proprietary**

Comparison of Rates Charged by SBC BOCs to Section 272 Affiliates to Rates Charged by SBC BOCs to Other Unaffiliated Entities

Differences Noted in Rates Charged by Indiana Bell and Wisconsin Bell				
USOC	Class of Service	State	Customer	Unit Rate
CKC	CYRJX	Indiana	**proprietary**	**proprietary**
CKC	CYRJX	Indiana	**proprietary**	**proprietary**
CKC	CYRJX	Indiana	**proprietary**	**proprietary**
CKC	CYRJX	Indiana	**proprietary**	**proprietary**
NRSX1	CYRJX	Indiana	**proprietary**	**proprietary**
NRSX1	CYRJX	Indiana	**proprietary**	**proprietary**
NRSX1	CYRJX	Indiana	**proprietary**	**proprietary**
NRSX1	CYRJX	Indiana	**proprietary**	**proprietary**
LTG6X	MZC	Wisconsin	**proprietary**	**proprietary**
LTG6X	MZC	Wisconsin	**proprietary**	**proprietary**
LTG6X	MZC	Wisconsin	**proprietary**	**proprietary**
LTG6X	MZC	Wisconsin	**proprietary**	**proprietary**
TZ4X3	MZC	Wisconsin	**proprietary**	**proprietary**
TZ4X3	MZC	Wisconsin	**proprietary**	**proprietary**
TZ4X3	MZC	Wisconsin	**proprietary**	**proprietary**
TZ4X3	MZC	Wisconsin	**proprietary**	**proprietary**
TZ4X3	MZC	Wisconsin	**proprietary**	**proprietary**
WF8	MZC	Wisconsin	**proprietary**	**proprietary**
WF8	MZC	Wisconsin	**proprietary**	**proprietary**
ZPAZD	MZC	Wisconsin	**proprietary**	**proprietary**
ZPAZD	MZC	Wisconsin	**proprietary**	**proprietary**

Comparison of Rates Charged by SBC BOCs to Section 272 Affiliates to Rates Charged by
SBC BOCs to Other Unaffiliated Entities

Differences Noted in Rates Charged by Pacific Bell		
USOC	Customer	Unit Rate
1L5XX	**proprietary**	**proprietary**
1L5XX	**proprietary**	**proprietary**
9PZCX	**proprietary**	**proprietary**
9PZCX	**proprietary**	**proprietary**
TMECS	**proprietary**	**proprietary**
TMECS	**proprietary**	**proprietary**